UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WILLIE JOHNSON,)
Plaintiff,)
v.) Case No. 07 C 6862
ROBERT GARZA, ANTHONY AMATO,) Judge Milton I. Shadur
VERNON MITCHELL, JR., THOMAS HARRIS, THOMAS McDERMOTT,) Magistrate Judge Jeffrey Cole
DONNA STRAND, DANIEL LUDWIG, ENRIQUE PACHECO, JR., PATRICK)
JOHNSON, BRYANT GARCIA, A. TORRES (Star # 5331), and CITY OF CHICAGO,)
Defendants.)
	J

PLAINTIFF'S UNOPPOSED MOTION FOR ORDER EXTENDING TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Plaintiff, WILLIE JOHNSON, by and through his attorney, Irene K. Dymkar, moves this court to enter an order extending the time to respond to defendants' motion to dismiss the complaint. In support of this motion, plaintiff states:

- 1) This is a civil rights case brought pursuant to 42 U.S.C. § 1983. Defendants have brought a motion to dismiss all federal claims in the complaint. Although I have been diligently working on this case, I have not been able to complete a response to defendants' motion.
- 2) I am currently responding to an extensive motion for summary judgment and am preparing two plaintiffs' motions for summary judgment in other, unrelated cases. Yet another case of mine that was scheduled for trial on the April calendar settled after all the work on the pre-trial order was completed. These commitments in other cases have

unfortunately set me back in my work on the present case.

3) I spoke to defense counsel, Patricia J. Kendall, on April 18, 2008, and asked if she would consent to an extension until May 5, 2008, for me to respond to defendants' motion. She said she would, as long as the schedule for her reply could be adjusted accordingly. Presently, we are scheduled to be back in court on April 28, 2008, for a status hearing

4) Because this extension should result in a more thorough briefing for the Court, it is believed that this may assist the Court in rendering its decision and will not cause any delay that will prejudice any party. Plaintiff therefore requests the Court's indulgence in granting this extension.

WHEREFORE, plaintiff, WILLIE JOHNSON, respectfully requests that the Court grant an Order extending until May 5, 2008, the deadline for plaintiff to respond to defendants' motion to dismiss all federal counts in the complaint.

Dated: April 21, 2008

s/ Irene K. Dymkar

Irene K. Dymkar

Plaintiffs' Attorney: Irene K. Dymkar 300 West Adams, Suite 330 Chicago, IL 60606-5107 (312) 345-0123